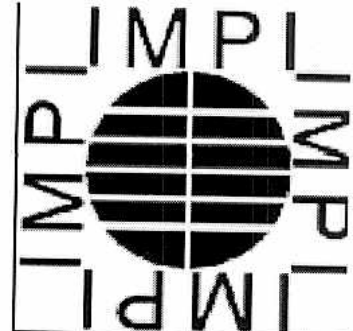


June 27, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554



www.impi.org

Re: IB Docket No. 02-364
ET Docket No. 00-258

Dear Ms. Dortch:

The International Microwave Power Institute ("IMPI") writes at this time to express its concerns regarding proposals to limit Industrial, Scientific and Medical ("ISM") operations in the band 2496-2500 MHz. In particular, IMPI wishes to express its strong opposition to proposals by the Wireless Communications Association International, Inc., Sprint Corporation, and Nextel Communications, Inc. (the "Petitioners") that the Commission should reconsider its earlier decision not to impose tighter power limits on ISM equipment operating in the band. In support IMPI offers the following:

IMPI is the oldest international association involved with ISM issues. IMPI was founded in 1965 to promote education concerning, and research, development and application of, electromagnetic technologies, especially microwave and other RF. Since its founding, IMPI has become the largest non-profit resource for ISM technologies with over 700 members and subscribers worldwide. IMPI has participated in a number of Commission proceedings involving ISM equipment and policy.

The Petitioners have argued that the Commission should impose tighter emission limits on ISM equipment operating in the subject band. They argue that normal Part 18 limits will not protect them, and that ISM equipment marketed from and after December 31, 2006, should meet Part 15 levels, i.e. no more than 500 uV/m at 3 meters, for this band.

IMPI has had an opportunity to review the filings made in this docket by Fusion UV Systems, Inc. and the Association of Home Appliance Manufacturers, and is pleased to endorse the views expressed therein. Beyond this, IMPI wishes to provide additional information for the Commission's consideration.

ISM equipment includes an enormous variety of devices performing critical functions for industry, science and medicine. These include ultrasound and magnetic resonance imaging machines used in medical diagnosis, medical diathermy devices used for treating muscle and ligament injuries, RF lighting ballast transformers, RF welding devices, ultrasonic cleaning devices used in the jewelry industry, and heating devices used in industrial, commercial and consumer settings.

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ISM heating devices include ovens used in nearly all meat, fish and vegetable processing plants; ovens used in the manufacture of chemicals and pharmaceuticals; and ovens used in vulcanizing rubber (such as for automobile weather stripping, refrigerator door seals, and the like), to name just a few.

ISM devices include microwave curing equipment used in manufacturing syringes, in sealing labels, in curing optical discs and optical fiber, in applying coatings to automobiles and aircraft surfaces, and in sealing optical film to flat panel television monitors.

And ISM devices include shrink-wrap equipment used to apply plastic film to consumer products, glue dryers used in the furniture manufacturing and boat building industries, and equipment used in the printing of designs and logos on textiles.

These are just a few of the many kinds of ISM devices used in commercial, industrial, and medical settings. These devices are in addition to the millions of microwave ovens operating in the consumer marketplace today.

Many of the devices described above operate in the 2.4 GHz band. Having operated in this band for decades under internationally harmonized regulations, the benefits to the US economy, to scientific endeavor, and to medicine, from 2.4 GHz ISM equipment are manifold. To adopt the relief sought by the Petitioners' would be enormously disruptive and costly. Moreover, it would represent an about-face on the part of the United States which, together with so many other countries, has used the 2.4 GHz band for unlicensed ISM devices for many years. This harmonized international designation has achieved major economies of scale which, in turn, provides significant cost savings for American consumers and increased competitiveness for American manufacturers.

The Commission reached the correct result when it denied the Petitioners' earlier request for more restrictive ISM rules for 2496-2500 MHz. For the reasons set forth here, IMPI urges the Commission to adhere to this determination, and to promptly deny the Petitioners' request.

Sincerely,



Neal S. Cooper
IMPI President

Cc: The Honorable Kevin J. Martin, Chairman
The Honorable Kathleen Q. Abernathy
The Honorable Jonathan S. Adelstein
The Honorable Michael J. Copps

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